Robert Fantone #087172014

Andrew Mancilla

Mancilla & Fantone LLP

260 Madison Avenue, 22nd Floor

New York, New York 10016

Telephone: 646.225.6686 Facsimile: 646.655.0269

robert@law-mf.com

Anthony J. Dain (*admitted pro hac vice*) Frederick K. Taylor (*admitted pro hac vice*)

Procopio, Cory, Hargreaves & Savitch LLP

525 B Street, Suite 2200

San Diego, CA 92101

Telephone: 619.238.1900 Facsimile: 619.235.0398

Attorneys for Defendants SLI Production Corp., Hair Zone, Inc. and Beauty Essence, Inc.

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JBS HAIR, INC.,

Plaintiff,

V.

Case No. 2:22-cy-01576

SLI PRODUCTION CORP.,

Defendant.

JBS HAIR, INC.,

Plaintiff,

v.

Case No. 2:22-cv-01577

HAIR ZONE, INC.,

Defendant.

JBS HAIR, INC.,

Plaintiff,

V.

Case No. 2:22-cv-01769

BEAUTY ESSENCE, INC.,

Defendant.

DEFENDANTS HAIR ZONE, INC. AND BEAUTY ESSENCE, INC.'S NOTICE OF EX PARTE MOTION AND MOTION TO STAY PROCEEDINGS

PLEASE TAKE NOTICE that pursuant to Local Rule 65.1(b) attorneys for defendants Hair Zone, Inc. ("Hair Zone") and Beauty Essence, Inc. ("Beauty Essence"), bring this ex parte motion before the Honorable Andre M. Espinosa, U.S.M.J., for an Order staying all proceedings in this case until the final determination of the matter now pending before the United States International Trade Commission entitled In the Matter of Certain Pre-Stretched Synthetic Braiding Hair and Packaging Therefor, Inv. No. 337-TA-1415. This ex parte motion is brought pursuant to 28 U.S.C. § 1659(a) and the Court's inherent powers.

Defendants Hair Zone and Beauty Essence have conferred with Plaintiff's counsel and Plaintiff is opposed to the motion to the extent that a stay is not also being sought for Defendant SLI Production, Corp.

In support of their Motion, Defendants Hair Zone and Beauty Essence rely on the accompanying Memorandum of Law in Support thereof, the Declaration of Frederick K. Taylor (along with exhibits thereto), and the Court's records and file herein.

In accordance with Local Rule 7.1(e), a proposed Order is submitted herewith.

September 18, 2024

/s/ Frederick K. Taylor

Anthony J. Dain (admitted pro hac vice) Frederick K. Taylor (admitted pro hac vice) Procopio, Cory, Hargreaves & Savitch LLP 525 B Street, Suite 2200 San Diego, CA 92101 Telephone: 619.238.1900

Facsimile: 619.235.0398

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